

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER (“ALEX”) E. JONES;
INFOWARS, LLC, a Texas Limited Liability
Company; FREE SPEECH SYSTEMS, LLC, a
Texas Limited Liability Company; LEE
STRANAHAN; LEE ANN MCADOO A/K/A
LEE ANN FLEISSNER; SCOTT CREIGHTON;
JAMES (“JIM”) HOFT; DERRICK WILBURN;
MICHELE HICKFORD; and WORDS-N-IDEAS,
LLC,

Defendants.

No. 3:18-cv-00017-NKM-JCH

**PLAINTIFF’S NOTICE REGARDING HEARING ON DEFENDANTS’ MOTIONS FOR
RECONSIDERATION OR CERTIFICATION FOR INTERLOCUTORY APPEAL**

Elizabeth B. Wydra, admitted *pro hac vice*
Brienne J. Gorod, admitted *pro hac vice*
CONSTITUTIONAL ACCOUNTABILITY
CENTER
1200 18th Street, N.W., Suite 501
Washington, D.C. 20036
(202) 296-6889
elizabeth@theusconstitution.org
brienne@theusconstitution.org

Andrew Mendrala, VA State Bar #82424
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue, N.W.
Fifth Floor
Washington, D.C. 20005
(202) 408-4600
amendrala@cohenmilstein.com

Aderson Francois, admitted *pro hac vice*
CIVIL RIGHTS CLINIC
GEORGETOWN UNIVERSITY LAW CENTER
600 New Jersey Avenue, N.W.
Washington, D.C. 20001
(202) 661-6739
aderson.francois@georgetown.edu

Counsel for Plaintiff Brennan Gilmore

Plaintiff Brennan Gilmore respectfully files this notice to advise the Court that he does not believe a hearing is necessary to decide Defendants' motions for reconsideration and interlocutory appeal. As explained in detail in Plaintiff's May 16, 2019 response to Defendants' motions, Defendants have not met the heavy burden required to obtain reconsideration or interlocutory review. *See* Dkt. No. 145. Instead, Defendants have simply rehashed the same arguments they made in their motions to dismiss regarding why the Court lacks personal jurisdiction over them, arguments which this Court rejected in its well-reasoned opinion. *See* Dkt. No. 123. For that reason, it would unnecessarily waste this Court's time and tax this Court's resources to hold a hearing on motions that restate the same arguments this Court heard at the November 13, 2018 hearing on Defendants' motions to dismiss.

Dated: June 18, 2019

Elizabeth B. Wydra, admitted *pro hac vice*
Brienne J. Gorod, admitted *pro hac vice*
CONSTITUTIONAL ACCOUNTABILITY
CENTER
1200 18th Street, N.W., Suite 501
Washington, D.C. 20036
(202) 296-6889
elizabeth@theusconstitution.org
brienne@theusconstitution.org

Respectfully submitted,

/s/ Andrew Mendrala
Andrew Mendrala, VA State Bar #82424
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue, N.W.
Fifth Floor
Washington, D.C. 20005
(202) 408-4600
amendrala@cohenmilstein.com

Aderson Francois, admitted *pro hac vice*
CIVIL RIGHTS CLINIC
GEORGETOWN UNIVERSITY LAW CENTER
600 New Jersey Avenue, N.W.
Washington, D.C. 20001
(202) 661-6739
aderson.francois@georgetown.edu

Counsel for Plaintiff Brennan Gilmore

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2019, a true and correct copy of the foregoing document was served on all parties via the Electronic Case Filing (ECF) system.

Dated: June 18, 2019

/s/ Andrew Mendrala
Andrew Mendrala